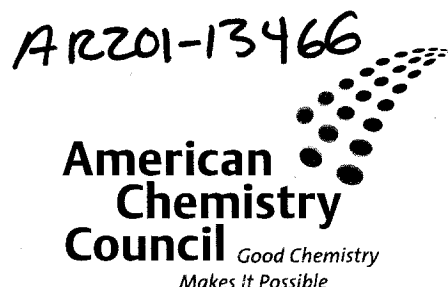


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COURTNEY M. PRICE
VICE PRESIDENT
CHEMSTAR



December 20, 2001

Ms. Christine Todd Whitman, Administrator
U.S. Environmental Protection Agency
PO Box 1473
Merrifield, VA 22116

Subject: HPV Chemical Challenge Program – Test Plan Submission for Consortium # [REDACTED]

Dear Administrator Whitman:

The American Chemistry Council's Aliphatic Esters Panel (Panel) submits for review and public comment its test plan, as well as related robust summaries, for the "Aliphatic Esters" category of chemicals under the Environmental Protection Agency's High Production Volume (HPV) Chemical Challenge Program. The Panel understands that there will be a 120-day review period for the test plan and that all comments generated by or provided to EPA will be forwarded to the Panel for consideration.

The Aliphatic Esters category consists of 45 chemicals whose physicochemical and toxicological properties are likely to be similar or follow a regular pattern as a result of structural similarity. Within this category, there are 5 groups of chemicals. These groups are based on similarities such as: common functional groups; the likelihood of common precursors and/or breakdown products, via physical or biological processes, which result in structurally similar chemicals; and incremental and constant changes across the groups. The Panel believes that this category meets the Challenge Program's definition of a chemical category.

The Panel has given careful consideration to the animal welfare principles contained in the EPA's October 14, 1999, letter to HPV Challenge Program participants. As directed, the Panel has sought to maximize the use of existing data for scientifically appropriate related chemicals and structure-activity-relationships. Additionally, the Panel has conducted a thoughtful, qualitative analysis rather than use a rote checklist approach in analyzing the adequacy of existing data.

The Panel intends to fulfill all the Screening Information Data Set (SIDS) endpoints of the HPV program through the use of existing data. In addition, some endpoints have been



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completed through the utilization of data from studies conducted on structurally similar compounds and from modeling programs accepted by the EPA. The Panel believes these data are adequate to satisfy the requirements of the HPV program without the need for new or additional tests.

John Morris of my staff is the technical contact for this Panel. Should you have any questions or comments, please contact him at 703-741-5631 (Phone), 703-741-6091 (Fax) or John_Morris@americanchemistry.com (e-mail).

Courtney M. Price
Vice President, CHEMSTAR

Attachment

cc: O. Hernandez, EPA
C. Auer, EPA
Aliphatic Esters Panel
Steven Russell, ACC
Jim Keith, ACC